

## REMARKS

### **I. Introduction**

New claim 26 has been added. Claims 1, 2, 10-12, 20, 21, 23 and 24 have been amended to particularly point out and distinctly claim the subject matter of the present invention. Thus, claims 1-26 are now pending in the present application. No new matter has been added. In view of the above amendments and the following remarks, it is respectfully submitted that all of the presently pending claims are allowable.

### **II. The Objection To The Claims Should Be Withdrawn**

Claims 1, 2, 10-12, 20 and 21 stand objected to because of the use of the terms "external to" and "internal to." *Office Action*, p. 2. Applicants have amended the claims to remove these terms and clarify the structural relationship between the claim elements.

The Examiner has also stated that the term "circular X-polarizer" is unclear. *Office Action*, p. 2. The specification provides an example of a circular X-polarizer by stating that a circular X-polarizer may include "a linear X-polarizer in combination with a quarter wave plate." *Specification*, ¶12. The specification further states that external incident light is first X-polarized and then circularly polarized as it passes through the circular X-polarizer. *Specification*, ¶14. That is, the linear X-polarizer absorbs incident light from all directions (including the Y direction) except the X direction, from which light passes through and becomes circularly polarized by the quarter wave plate. Therefore, the circular X-polarizer polarizes only in the X-direction prior to converting the X-polarized light into circular polarized light. Thus, it is respectfully submitted that the term "circular X-polarizer" has been sufficiently defined in the specification. In view of the remarks above, it is respectfully submitted that the objections be withdrawn.

### III. The Claim Rejections Under 35 U.S.C. § 102(b) Should Be Withdrawn

Claims 1, 3-5, 8, 10, 11, 13-15, 18 and 20 stand rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 6,462,805 B1 to Wu et al. ("Wu"). *Office Action*, p. 2.

Wu describes a transfective LCD 300 which includes a circular polarizer 330-A positioned on an outer surface of a front substrate 310-A. A transfective mirror 340 is positioned beneath the front substrate 310-A and on an outer surface of a rear substrate 310-B. Another circular polarizer 330-B is positioned beneath the transfective mirror 340 and above a light source 350. *Wu*, col. 7, ll. 13-54.

Claim 1 recites a device for displaying images including "*a first circular X-polarizer*" and "*a second circular X-polarizer*." The term "circular X-polarizer" has been explained above. In particular, the first and second circular X-polarizers polarize incident light in the X-direction only, prior to conversion into circular polarized light.

Applicants respectfully submit that Wu neither discloses nor suggests "*a first circular X-polarizer*" and "*a second circular X-polarizer*." In contrast, Wu describes the LCD 300 with the circular polarizer 330-B "having a handedness opposite to the handedness of the circular polarizer 330-A." *Id* at col. 7, ll. 39-43. Wu does not disclose how light is linearly polarized by the circular polarizers 330A and 330B. That is, if a circular polarizer comprises a linear polarizer and a quarter-wave plate, Wu does not disclose or suggest what type of linear polarizers (X or Y) are being used to construct the circular polarizers 330-A and 330-B. Wu does, however, describe an embodiment of the LCD which utilizes a pair of linear polarizers that are oriented normal to each other (e.g., if one is a linear X-polarizer, the other must be a linear Y-polarizer). *Id* at col. 5, ll. 13-17. Accordingly, neither the linear polarizers nor the circular polarizers include two circular X-polarizers. Thus, it is respectfully submitted that Wu does not disclose or suggest "*a first circular X-polarizer*" and "*a second circular X-polarizer*" as recited in claim 1.

It is respectfully submitted, therefore, that claim 1 is allowable. Because claims 3-5 and 8 depend from, and, therefore include all of the limitations of claim 1, it is respectfully submitted that these claims are also allowable.

Claim 10 recites limitations substantially similar to those of claim 1, including "a first circular X-polarizer" and "a second circular X-polarizer." Thus, it is respectfully submitted that claim 10 is allowable for at least the reasons stated above with reference to claim 1. Because claims 11, 13-15 and 18 depend from, and, therefore include all of the limitations of claim 10, it is respectfully submitted that these claims are also allowable for at least the reasons stated above with reference to claim 10.

Claim 20 recites limitations substantially similar to those of claim 1, including "*an internal circular X-polarizer*" and "*an external circular X-polarizer*." Thus, it is respectfully submitted that claim 20 is allowable for at least the reasons stated above with reference to claim 1.

#### **IV. The Claim Rejections Under 35 U.S.C. § 103(a) Should Be Withdrawn**

Claims 6, 7, 9, 16, 17 and 19 stand rejected under 35 U.S.C. § 103(a) as unpatentable over Wu in view of U.S. Patent No. 6,853,421 B2 to Sakamoto et al ("Sakamoto"). *Office Action*, p. 4.

Applicants respectfully submit that Sakamoto does not cure the above-described deficiencies of Wu. Thus, because claims 6, 7 and 9 depend from, and, therefore include all of the limitations of claim 1, it is respectfully submitted that these claims are also allowable for at least the reasons stated above with reference to claim 1. Because claims 16, 17 and 19 depend from, and, therefore include all of the limitations of claim 10, it is respectfully submitted that these claims are also allowable for at least the reasons stated above with reference to claim 10.

Claims 2 and 12 stand rejected under 35 U.S.C. § 103(a) as unpatentable over Wu in view of U.S. Patent No. 6,853,421 B2 to Minakuchi. *Id* at p. 6.

Applicants respectfully submit that Minakuchi does not cure the above-described deficiencies of Wu. Thus, because claim 2 depends from, and, therefore includes all of the limitations of claim 1, it is respectfully submitted that this claim is also allowable for at least the reasons stated above with reference to claim 1. Because claim 12 depends from, and, therefore includes all of the limitations of claim 10, it is respectfully submitted that this claim is also allowable for at least the reasons stated above with reference to claim 10.

Claims 21-23 stand rejected under 35 U.S.C. § 103(a) as unpatentable over Wu in view of U.S. Patent No. 6,642,977 B2 to Kotchick et al. ("Kotchick"). *Id*.

Claim 21 recites limitations substantially similar to claim 1, including "*a first circular X-polarizer*" and "*a second circular X-polarizer*." Applicants respectfully submit that Kotchick does not cure the above described deficiencies of Wu. Thus, it is respectfully submitted that neither Wu nor Kotchick, either alone or in combination, discloses or suggests "*a first circular X-polarizer*, and "*a second circular X-polarizer*," as recited in claim 21.

It is respectfully submitted, therefore, that claim 21 is allowable. Because claims 22 and 23 depend from, and, therefore include all of the limitations of claim 21, it is respectfully submitted that these claims are also allowable.

Claims 24 and 25 stand rejected under 35 U.S.C. § 103(a) as unpatentable over Wu in view of Kotchick and in further view of U.S. Patent No. 5,548,108 to Moldskred et al. ("Moldskred"). *Id* at p. 7.

Applicants respectfully submit that Moldskred does not cure the above-mentioned

deficiencies of Wu and Kotchick. Thus, because claims 24-25 depend from, and, therefore include all of the limitations of claim 21, it is respectfully submitted that these claims are also allowable for at least the reasons stated above with reference to claim 21.

New Claim 26 recites a device for displaying images including limitations substantially similar to claim 1 including "*a first circular X-polarizer, and "a second circular X-polarizer."* Claim 26 further recites "*a mirror internal to a first portion of the liquid crystal display, the first circular X-polarizer internal to a second portion of the liquid crystal display."*

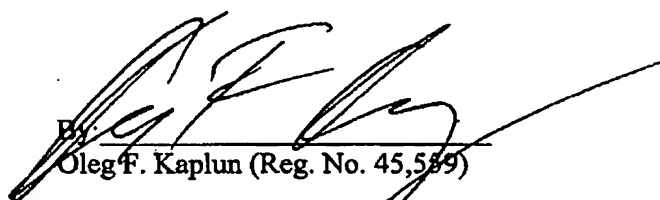
Applicants respectfully submit that neither Wu nor Sakamoto nor Minakuchi nor Kotchick nor Moldskred, either alone or in combination, anticipate or render obvious the subject matter of claim 26.

**CONCLUSION**

It is therefore respectfully submitted that all of the now pending claims are allowable. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

Dated: June 6, 2005

  
By: Oleg F. Kaplun (Reg. No. 45,589)

Fay Kaplun & Marcin, LLP  
150 Broadway, Suite 702  
New York, New York 10038  
Tel: (212) 619-6000  
Fax: (212) 619-0276